

EXHIBIT 17



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May 27, 2022

Via TrueFiling

Honorable Chief Justice Tani Cantil-Sakauye
and Honorable Associate Justices
Supreme Court of California
350 McAllister Street, Room 1295
San Francisco, CA 94102-4797

RE: *Southwest Regional Council of Carpenters, et al. v. City of Los Angeles*, Case No. S274474
Amicus Letter in Support of Petition for Review (Cal. Rule of Court 8.500(g)(1))

Dear Chief Justice Cantil-Sakauye and Honorable Associate Justices:

Amicus Curiae Greenfire Law, PC respectfully requests that this Court grant the Petition for Review filed by Southwest Regional Council of Carpenters in the above-captioned matter.

The Petition for Review presents an issue of recurring and substantial importance to ensure the integrity of the California Environmental Quality Act (CEQA). The single most fundamental requirement of CEQA is that the environmental impact report (EIR) must have an “accurate, stable and finite” description of the proposed project, (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193), presented at a time when the public can provide meaningful comments. The public cannot meaningfully participate in the CEQA process if they do not have an accurate description of the proposed project. As discussed in the Petition for Review, after decades of consistent case law, in recent years, the law in this area has fallen into a state of disarray.

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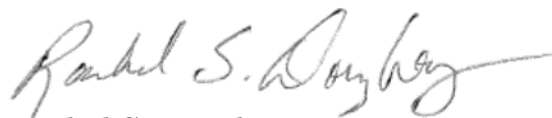
I write on behalf of Greenfire Law, PC to urge this Court to grant review to bring uniformity to increasingly inconsistent lines of cases. Greenfire Law, PC has an interest in ensuring that CEQA remains an effective statute to protect the environment. We are an environmental law firm located in the Bay Area. Our clients are generally citizens groups, often inexperienced in administrative process or environmental law, and usually resource-limited. Sometimes they expend significant sums to have experts weigh in on project proposals. Public participation already feels to our clients late in the game, abbreviated, and confusing. A shifting project description will confound our clients, discourage meaningful public participation process, and undermine faith that government processes are transparent.

One pillar of the CEQA process is the opportunity for active public participation: indeed, such participation is a requirement in order to seek judicial review of an agency's decision. In the case at issue, the City of Los Angeles released a draft EIR describing a 422-unit project with 200,000 square feet of commercial space. However, the City ultimately approved a 623-unit project with 60,000 square feet of commercial space. The public had no opportunity to comment on the project that was ultimately approved.

Greenfire Law, PC is concerned that the decision will allow agencies to describe comparatively benign projects in the draft EIR, but then ultimately approve significantly different and more impactful projects after the close of the public comment period. This will feel to people like our clients to be a bait and switch, will seriously undermine the entire CEQA process, and discourage participation. Such an outcome is inconsistent with the spirit behind CEQA, and any decision which would cause such a shift in the CEQA landscape, must be thoroughly reviewed by our State's highest court.

For this reason, and the reasons set forth in the Petition for Review, Greenfire Law, PC urges this Court to grant the Petition for Review.

Respectfully submitted,



Rachel S. Doughty
Greenfire Law, PC

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PROOF OF SERVICE

I am employed in the County of Alameda, State of California. I am over the age of 18 years and not a party to the within action; my business address is P.O. Box 8055, Berkeley, CA 94707.

On May 27, 2022, I served the following document(s):

AMICUS CURIAE LETTER IN SUPPORT OF PETITION FOR REVIEW

X by transmitting a true and correct electronic copy via this Court's TrueFiling system to those participants registered with the Court's TrueFiling system.

X by placing a true and correct copy(ies) thereof in a sealed envelope with postage affixed hereon fully prepaid in the United States mail for participants not registered with the Court's TrueFiling system, at Oakland, California, addressed as set forth below.

PLEASE SEE ATTACHED SERVICE LIST

I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, all mail is deposited with the U.S. Postal Service on the same day with postage thereon, fully prepaid at Oakland, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postage meter date is more than one day after date of deposit for mailing in the affidavit.

I declare under penalty of perjury, pursuant to the laws of the State of California, that the above is true and correct.

Executed on May 27, 2022, at Oakland, California.

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SERVICE LIST

PARTIES	ATTORNEYS	SERVICE BY
Honorable Chief Justice Tani Cantil-Sakauye and Associate Justices of the Supreme Court of the State of California	350 McAllister Street, Room 1295 San Francisco, CA 94102-4797 (8 copies by Mail)	TrueFiling and USPS First Class Mail
City of Los Angeles: Appellant Los Angeles City Council: Appellant Department of City Planning: Appellant	Michael Feuer Leonard Aslanian Office of the City Attorney 200 N. Main Street, Rm. 920, City Hall East Los Angeles, CA 90012 Tina A. Thomas Amy R. Higuera Thomas Law Group 455 Capitol Mall, Ste. 801 Sacramento, CA 95814	TrueFiling
The Icon at Panorama, LLC: Real Party in Interest and Appellant	Damon P. Mamalakis Armbruster Goldsmith & Delvac LLP 12100 Wilshire Blvd., Ste. 1600 Los Angeles, CA 90025	TrueFiling
Southwest Regional Council of Carpenters, et al.	Richard Toshiyuki Drury Lozeau Drury LLP 1939 Harrison Street, Suite 150 Oakland, CA 94612	TrueFiling
Court of Appeal State of California Second App. District, Div. 4	300 So. Spring St. 2nd Floor Los Angeles, CA 90013	USPS First Class Mail

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